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TRANSPORTATION DEPARTMENT
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October 22, 2001

Docket Management Facility
 U.S. Department of Transportation
 Dockets Management Facility, Room PL-401,
 400 Seventh Street, SW
 Washington, DC 20590-0001

RE: Docket Number FMCSA-2001-9709 - 40
 Commercial Driver's License Standards; Requirements and Penalties;
 Commercial Driver License Program Improvements


Dear Sir or Madam:

The following are comments from the Idaho Transportation Department (ITD), Division of Motor Vehicles (DMV) regarding proposed rulemaking, Docket Number FMCSA-2001-9709, Commercial Driver's License Standards; Requirements and Penalties; Commercial License Program Improvements:

- The ITD/DMV supports efforts to enhance the CDL program.
- Re: Section 383.52: It is recommended that FMCSA should put a pointer on PDPS for emergency disqualification of drivers.
- Re: Section 383.71 and 384.206: It is recommended that a three-year cut-off be applied to the record-checking requirement. I.e. records would be checked for any state in which the driver had previously been licensed within the last three years. Without a cut-off, states would have difficulty keeping up with requests for records from other states.
- The fiscal impact to develop and implement the changes in Idaho has been roughly estimated at around \$500,000 to \$800,000. This estimate is based on hiring contract programmers to implement an all driver pointer system to provide automation for state-to-state checks of driver records. It does not include salaries of current staff re-directed to this project or the ongoing personnel costs after implementation.
- Some provisions of the proposed rule will require legislative changes for implementation in Idaho.

Please consider these comments prior to implementing the proposed rule. If you need clarification about the comments made, please call Edward Pemble, Driver Services Manager at (208) 332-7830.

Sincerely,


 Morris W. Detmar, Administrator
 Division of Motor Vehicles

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